IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SOVERAIN SOFTWARE LLC, PLAINTIFF, V. CDW CORPORATION, NEWEGG INC., REDCATS USA, INC., SYSTEMAX INC., ZAPPOS.COM, INC., REDCATS USA, L.P., THE SPORTSMAN'S GUIDE, INC,. AND TIGERDIRECT, INC., DEFENDANTS.	Civil Action No. 6:07-cv-5 11 (LED)

**DECLARATION OF MARY-OLGA LOVETT, ESQ., SUBMITTING
DOCUMENTS AND EXHIBITS IN SUPPORT OF SYSTEMAX AND
TIGERDIRECT'S CLAIM CONSTRUCTION BRIEF**

I, Mary-Olga Lovett, declare as follows:

1.   I am an attorney admitted to practice in the state of Texas and before this

Court, and am a Shareholder with the law firm of Greenberg Traurig, LLP, counsel for

Systemax, Inc. and TigerDirect, Inc.. (collectively, "Systemax").   I submit this

declaration in support of Systemax's claim construction brief. I have personal knowledge

of the facts set forth herein and, if called as a witness, I would and could competently

testify to such facts under oath.

2.   Appended hereto as Exhibit 1 is a true and correct copy of U.S. Patent No.

5,715,314 ("the '314 patent") as issued by the United States Patent and Trademark Office

("USPTO").

3. Appended hereto as Exhibit 2 is a true and correct copy U.S. Patent No. 5,909,492 ("the '492 patent.") as issued by the USPTO.

4. Appended hereto as Exhibit 3 is a true and correct copy of the Section 201.07 of the Manual of Patent Examining Procedure

5. Appended hereto as Exhibit 4 is a true and correct copy of the notes of Andrew Payne, entitled "Notes for the Web payment system," dated July 18, 1994, as produced by Soverain and Bates-labeled SVN2-0040037-42.

6. Appended hereto as Exhibit 5 is a true and correct copy of the Preliminary Report of Soverain's Expert Michael Shamos, dated May 9, 2005.

7. Appended hereto as Exhibit 6 is a true and correct copy of certain pages of Source Code, Appendix F to the '314 and '492 patents, Bates labeled SOV0000241 and SOV0000254.

8. Appended hereto as Exhibit 7 is a true and correct copy of Appendix E to the '314 and '492, Bates labeled SOV0000145-156.

9. Appended hereto as Exhibit 8 is a true and correct copy of U.S. Patent No. 7,272,639 ("the '639 patent.") as issued by the USPTO.

10. Appended hereto as Exhibit 9 is a true and correct copy of of U.S. Patent No. 5,708,780 ("the '780 patent.") as issued by the USPTO.

11. Appended hereto as Exhibit 10 is Amendment D from the file history of the '639 patent, dated December 28, 2001.

12. Appended hereto as Exhibit 11 is a true and correct copy of an entry from the online dictionary *Webopedia*, defining the word "operator" as the person generally responsible for ensuring that the computer runs properly. (TD0060639)

13.   Appended hereto as Exhibit 12 is a true and correct copy an entry from the online dictionary *Webopedia*, listing definition for the word "computer."

14.   Appended hereto as Exhibit 13 is a true and correct copy an entry from the online dictionary *Webopedia*, listing definitions for the word "storage." (TD0060640-42)

15.   Annexed hereto as Exhibit 15 is a true and correct copy of an entry from the *Microsoft Computer Dictionary* (5th Ed.) for the word "access". (TD0060643).

I declare, under penalty of perjury that the foregoing is true and correct.

Dated: Houston, Texas
       May 1, 2009

Respectfully submitted,

GREENBERG TRAURIG, LLP

Mary-Olga Lovett
Attorney in Charge
Texas Bar No. 00789289
lovettm@gtlaw.com
1000 Louisiana Street, Suite 1800
Houston, Texas 77002
Telephone: (713) 374-3500
Telecopier: (713) 374-3505

**ATTORNEYS FOR DEFENDANTS
SYSTEMAX INC., AND
TIGERDIRECT, INC.**